Hi Jerry and thanks for your reply.

I left a voice mail requesting any information regarding this agreement document. I am not aware of it, but am not discounting my memory banks' either. Your District 4 folks should have some pertinent history, although, about 20 years or so ago, I was in several meetings with them and an offset operator about the opposite position of this issue!

I will also research this.

I am still certain that no oilfield operator is injecting refinery waste down Class II wells.

•⬜⬜⬜⬜⬜⬜ These particular Class II WD wells may be currently inactive, however, the DOGGR District 4 should ensure that the refinery waste is segregated from the oilfield's waste and that the injection of refinery waste is disallowed for those/any Class II wells.

•⬜⬜⬜⬜⬜⬜ Further, Alon currently has sufficient disposal capacity with their own Regional Bd. permitted injection wells.

•⬜⬜⬜⬜⬜⬜ I also am certain that Alon understands they cannot inject their waste into an oil-productive area – regardless of whether or not they own/operate the oilfield.

George

George Robin (robin.george@epa.gov)

Engineer, Underground Injection Control

US EPA, Region IX   *Phone (415) 972-3532*

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Ground Water Office

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San Francisco, CA 94105

From: Salera, Jerry@DOC [mailto:Jerry.Salera@conservation.ca.gov]
Sent: Wednesday, June 11, 2014 9:10 AM
To: Robin, George
Cc: Albright, David; Dermer, Michele; R9-Deep
Subject: RE: Alon Refinery question

Good morning George,

Thanks for this information. The two WD wells in the area are not injecting at the moment, because the operator does not have any production going.

RE the agreement about 20 years ago between EPA and DOGGR, is there a document that discusses this? If you have, I'd like to request a copy. Thanks.

Jerry

From: Robin, George [mailto:Robin.George@epa.gov]
Sent: Thursday, June 5, 2014 1:38 PM
To: Salera, Jerry@DOC; Dermer, Michele
Cc: Albright, David; Penderel, Bill@DOC; Robin, George; R9-Deep
Subject: RE: Alon Refinery question

Thanks Jerry, and please follow through when possible.

I am positive that the refinery has no Class II wells injecting refinery (Class 1) waste. They are situated within the Fruitvale Oil Field with many wells surrounding, however the wells the refinery operates for their waste fluids are only the ones permitted by the Reg. Bd. (25 years ago) and soon to be permitted as Class 1 NH wells by EPA Region 9.

The DOGGR categorically does not permit Class II wells injecting refinery waste, and further, they explicitly do not want refinery waste to migrate to any Production wells. Hence, because of this very situation in Bakersfield (approx. 20 years ago), EPA Region 9 and the DOGGR agreed to jointly ensure (for future permits) that nowhere within the state will such comingling migration be allowed to exist.

George

From: Salera, Jerry@DOC [mailto:Jerry.Salera@conservation.ca.gov]
Sent: Thursday, June 05, 2014 1:15 PM
To: Dermer, Michele
Cc: Robin, George; Albright, David; Penderel, Bill@DOC
Subject: Re: Alon Refinery question

Hi Michele,

I've been out sick since yesterday but checking emails from time to time. I'll pas this on to our colleagues in D4 and we'll get info back your end as soon as possible.

Bill: can you please get the needed info - thanks.

Jerry

Sent from my iPhone

On Jun 5, 2014, at 10:54 AM, "Dermer, Michele" <Dermer.Michele@epa.gov> wrote:

Hello Jerry,

Would you please let me know if Alon Refinery located in Bakersfield CA has any DOGGR permitted Class II disposal wells at their facility? I am not able to verify one way or another from the information I have here. And if so, where are those wells located.? Thanks!

Sincerely,

Michele